

OFFICIAL FILE

ILLINOIS COMMERCE COMMISSION

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STATE OF ILLINOIS

Nov 15 3 46 PM '01

ILLINOIS COMMERCE COMMISSION

CHIEF CLERK'S OFFICE

In the Matter of the Verified Notification :
 Of Sprint Communications Company L.P. : 01-0680
 d/b/a Sprint Communications L.P. to :
 Discontinue the Provision of Sprint IONSM :
 Service. :

RESPONSE TO PETITION

Now comes the Staff of the Illinois Commerce Commission ("Staff") and submits this response to the Petition filed by Sprint Communications Company L.P. d/b/a Sprint Communications L.P. ("Petitioner") on November 1, 2001, for notification pursuant to Illinois Statute 220 ILCS 5/13-406 to discontinue its provision of Sprint IONSM services in Illinois and to transfer the local voice components of Sprint IONSM customers' service to other local service providers on December 31, 2001.

Section 13-406 of the Public Utilities Act ("the Act") states:

...No telecommunications carrier offering or providing competitive telecommunications service shall discontinue or abandon such service once initiated except upon 30 days notice to the Commission and affected customers. The Commission may, upon its own motion or upon complaint, investigate the proposed discontinuance or abandonment of a competitive telecommunications service and may, after notice and hearing, prohibit such proposed discontinuance or abandonment if the Commission finds that it would be contrary to the public interest.

Sprint has provided Sprint IONSM local exchange service since July, 2001 and as of the filing date, has less than 250 customers in Illinois. Sprint will continue to offer its

interLATA and intraLATA long distance services. Sprint has also committed to explore various local strategies in an effort to develop a financially viable local product.

In response to the withdrawal of Sprint's IONSM service, Sprint has developed a customer notice plan. Prior to the filing, Sprint sent an email to its Illinois customers informing them of Sprint's intent to withdraw service and on October 30, 2001, Sprint mailed its Illinois customers the notice attached to the filing as Appendix A. This customer notice contained descriptions of the customer's service options to obtain different voice and data services, the timelines for Sprint's withdrawal, where to obtain additional information, and how to receive credit for costs customers incur as a result of the transfer of their local service. Sprint also plans to deliver two additional notices to its customers, one approximately 30 days before its withdrawal of its services and one approximately seven days prior to the withdrawal of service. Each notice will inform customers of their need to select a new local voice provider with Sprint crediting their account for costs they incur as a result of the transfer of their local service.

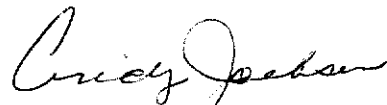
Sprint has established a generous credit structure for its customers to cover the charges associated with obtaining services from other providers. Depending on the type of service the customer receives from Sprint, credits will range from \$400 to \$600.

The Consumer Services Division has received six complaints from consumers in response to the Company's intent to withdraw the Sprint IONSM service. The complaints are two-fold: 1) consumers are very happy with Sprint's service and they do not want to lose the service and 2) some consumers just recently signed up for the service and felt that Sprint should have told them prior to signing up that they were going to withdraw the service.

Staff sympathizes with Sprint's satisfied customers, but the economic reasons and business rationale of the company cannot be ignored. Staff believes that the withdrawal of service is not contrary to the public interest for the following reasons: 1) the number of customers are minimal; 2) Sprint has filed a tariff changes stating that the Company will no longer accept new Sprint IONSM customers; 3) other carriers are available for the existing customers to select another service provider; and 4) multiple notices have or will be sent to current customers. Sprint is also offering a generous credit to its customers' for the inconvenience of having to switch to another provider. Staff recommends that the Commission grant Sprint's request to withdraw its Sprint IONSM service.

WHEREFORE, Staff does not seek a hearing in this matter.

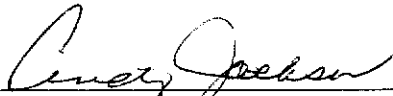
Respectfully submitted,

A handwritten signature in black ink, appearing to read "Cindy Jackson", is written over a horizontal line.

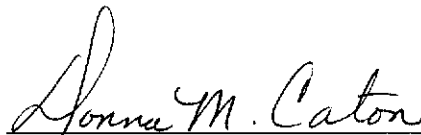
Cindy Jackson
Consumer Policy Analyst
Consumer Services Division

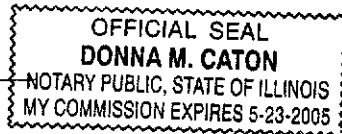
VERIFICATION

I, Cindy Jackson, first being duly sworn upon oath depose and say that I am a Consumer Policy Analyst in the Consumer Services Division, that I have read the above and foregoing Response to Petition, and that the facts and matters set forth therein are true to the best of my knowledge and belief.


Cindy Jackson, Staff Liaison
Consumer Services Division

Subscribed and sworn to before me
this 15th day of November, 2001.


(Notary Public)



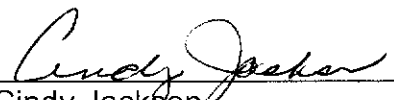
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NOTICE OF FILING

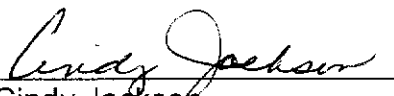
TO: SEE ATTACHED SERVICE LIST

YOU ARE HEREBY NOTIFIED that I have on this 15th day of November, 2001, forwarded to the Chief Clerk of the Illinois Commerce Commission, for filing in the above docket, a Response to Petition filed by Staff of the Illinois Commerce Commission, copies of which are hereby served upon you.


Cindy Jackson
Consumer Policy Analyst
Consumer Services Division

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing Notice, together with the documents referred to therein, were served upon the parties on the attached Service List, by first class mail, proper postage prepaid, from Springfield, Illinois on this 15th day of November, 2001.


Cindy Jackson
Consumer Policy Analyst
Consumer Services Division

SERVICE LIST

Kenneth A. Schiffman
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